

STATE OF ALASKA
**DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES**
DIVISION OF STATEWIDE PLANNING

TONY KNOWLES, GOVERNOR

3132 CHANNEL DRIVE
JUNEAU, ALASKA 99801-7898
PHONE: (907) 465-4070
TEXT: (907) 465-3652
FAX: (907) 465-6984

July 5, 2002

Ms. Ann Rappoport
Field Supervisor
USDI Fish and Wildlife Service
Ecological Services, Anchorage
605 West 4th Avenue, Room 61
Anchorage, AK 99501-2249

Subject: Comments from USFWS re Southwest Alaska Transportation Plan

Dear Ms. Rappoport:

Thank you for your letter of April 3. We appreciate your comments for improving the plan and the perspective your agency provides. We look forward to your continued interest in improving transportation for the residents of the region. You raised several points that we will address in order.

Best overall public interest

Your letter expressed concern that in our attempt to represent the best overall public interest, we may have overlooked the interests of an important segment of the public, namely stakeholders interested in maintaining the pristine nature of federal and state lands set aside for conservation, wildlife habitat and wilderness. You cited the absence of such a concern in the text of the purpose and need statement.

I assure you that this interest was not overlooked in our public involvement or in conversations with the communities. It is not necessary to include this in the purpose and need statement, as the statement quite simply expresses the reasons or need for planning in the first place. The parameters within which we plan include those stakeholder interests and many others as well.

Please note Goal #6 on Table 3 (p. 14) and associated objectives #3 "Minimize environmental impacts of the transportation network" and #4 "Maintain environmental integrity of Southwest Alaska and the value of environmental areas." We do not see transportation development and maintaining environmental integrity as necessarily mutually exclusive concepts.

Cold Bay - King Cove connection

Your comments took issue with our use of the term "surface" preceding "transportation link between the communities of King Cove and Cold Bay" as it could be misinterpreted as

meaning a ground or road link. You also objected to the schedule assumptions dropping *Tustumena* service to Cold Bay.

We will adjust the text to read “some combination of land and marine transportation” to avoid possible confusion. This bears some explanation.

The term “surface transportation” is clearly defined in the legal and regulatory use of the term to mean on the land and/or on the water. Federal transportation regulations provide for use of surface transportation funding, with some restrictions, for both roads and ferries.

The *King Cove - Cold Bay Facilities Concept Report and Assessment of Transportation Need* evaluated single mode (ferry or hovercraft) and dual mode (road and ferry/hovercraft) alternatives, with the understanding that a road through the Izembek NWR was not on the table for evaluation. The Southwest Plan continues to support the need for a solution without spelling out how to implement it.

We acknowledge Cold Bay’s preference for a ferry system link over the hovercraft link suggested in the study.

The final version of the plan will drop the draft plan assumption on page 20 that the *Tustumena* will call only at King Cove. While such a schedule change is ultimately an operational decision, it hinges on local transportation solutions that we as yet cannot predict with any certainty. So we will continue to plan on the basis of stops in both communities.

We appreciate your expressing the value *Tustumena* provides to the Fish and Wildlife Service operations in the Izembek National Wildlife Refuge (NWR), particularly regarding tourist interpretive programs and your plans to develop autobus refuge tours. Please realize that the operating budget constraints placed on us in the current austere state funding environment may negatively impact our ability to provide this service as regularly or as often as in the past.

Alaska Peninsula Highway

You expressed concern with portions of the corridor that appear to cross through the heart of the Alaska Peninsula NWR, and conflicts with proposed wilderness designations in the draft Revised Comprehensive Conservation Plan for the Alaska Peninsula/Becharof NWR.

The plan’s intent with these “corridors” is merely to document the validity of a transportation interest in them, the interest being neither trivial nor flippant, but expressed by the communities themselves. Prior to the Southwest Alaska Transportation Plan, our agency did not have an effective forum available for communities to express their interests in intercommunity links. Most have struggled to secure funding for even the most basic of community infrastructure needs.

We acknowledge the regulatory challenges associated with a number of these routes. The routes you cited (Chignik to Port Heiden and Chignik to Perryville) did not fare well in our analysis of costs and benefits, and we are not recommending any further action on them, save including provision for circumstances that might lead to their reevaluation in the future. The challenge to us now and in the future is not to view our respective regulatory

responsibilities as incompatible or irreconcilable, but rather to examine how we can work cooperatively to best recognize and meet *all* of the public values that are brought to our attention.

Concerning your comment about possible conflicts with proposed Wilderness designations: The routes being examined in the Southwest Transportation Plan were discussed with Pete Wikoff of USFWS some two years ago when he was preparing the alternatives for the Alaska Peninsula-Bearof NWR Revised Comprehensive Conservation Plan (CCP). The “Alaska Peninsula Highway” routes were not surprises to Mr. Wikoff. In the draft internal review CCP we received electronically, dated December 2000, these routes were mentioned in the Alternative Four (preferred) discussion, and the Chignik-Port Heiden route was specifically mentioned as a Lake and Peninsula Borough priority (admittedly as requiring exclusion of a previously designated wilderness area). Should the Southwest Plan draft prompt you to rewrite of any areas of the draft CCP, we would be happy to review any sections so affected and offer suggestions for improvement prior to your publishing the public review draft.

Cook Inlet to Bristol Bay

Your comments expressed concern that a road corridor following the general route presented in the Southwest Alaska Transportation Plan could have potential primary and secondary impacts to fish and wildlife resources in the Iliamna Lake area and opposed corridor reservation on that basis. You expressed alarm at the estimated 127,500 person trips in 2020 along the Igiugig-Naknek leg alone. So perhaps the recommendations and numbers bear some further explanation.

As with the segments of the Alaska Peninsula Highway mentioned earlier as well as Dillingham to Bristol Bay corridor, we are not recommending construction of these routes (except Williamsport-Pile Bay) or seeking permits. The numbers simply do not support construction in the near future. For very practical reasons dealing with duration limits in permitting regulations, we will generally not seek permits for construction until we are actually intending to begin construction in the near term. The intent and actual effect of the recommendation, as stated earlier, is not to determine a detailed route alignment, but rather to document the *validity of the specific interest* in surface transportation between communities for the purposes of future transportation and land management decisions.

To clarify the quantities --- 127,500 person trips amounts to about 350 person-trips per day, average. That includes both directions. It is person trips, not vehicle trips. Thus for example, a single guided bus tour of 35 individuals traveling from Naknek to Igiugig to view the Kvichak River and Lake Iliamna, then returning to Naknek would account for 70 of those person trips. We do not mean to diminish the need to act responsibly to safeguard fish and wildlife habitat in the event a specific action is proposed along this corridor (which it isn't), but we want you to have some perspective on what the numbers mean in reality. And the reality is these traffic numbers are not large.

Selected community linkages

Thank you for the information on the Women's Bay land exchange with Koniag, Inc. and the old culverts. We have passed this on to our Kodiak area planner.

Thank you for the information concerning salmon runs and Stellar's eider activity in the vicinity of the Chigniks. Our review of the City of Chignik public dock concept reports to

date indicates they considered this information in their facilities concept planning. We will consider this information in more detail when the project is actually funded.

Thank you for the information and update on activity regarding the King Cove - Cold Bay transportation link. We continue to monitor these developments with interest.

We appreciate USFWS' interest in the potential Naknek River crossing. We anticipate undertaking the economic feasibility and aviation needs study this fall. While its purpose is to examine potential management implications from a state and local government perspective, the project scope includes documenting social and environmental concerns. We recognize the magnitude of concerns associated with the construction of the bridge project and certainly intend to approach the subject carefully and deliberately.

Port and harbor improvements

Concerning the Kodiak dock, you mentioned possible locations in Gibson Cove or Women's Bay. The City of Kodiak has expressed interest in Near Island, St Paul Harbor Spit and Utti Island. The Alaska Marine Highway System (AMHS) is engaged in a ten-year strategic plan that will establish their priorities for capital improvements. This strategic plan will likely not determine a specific location, but will likely establish a "ball park" window for when the Kodiak dock improvements should be pursued, given all of AMHS' goals and responsibilities.

We appreciate the concern about cellular sheet-pile dock structures. Here we are merely acknowledging the concept reports prepared and funded by other government entities, including the Corps of Engineers. Some have been around for a few years. We will re-examine the plan text and adjust if it could be interpreted that we are endorsing the engineering concept. Our intent was to endorse the *need* conveyed in these earlier concept reports and draw our planning cost estimates from them. Should these projects be funded, they will of necessity go through preliminary design, environmental review, and final design before construction actually starts.

Dillingham-Aleknagik road, Wood River bridge and Aleknagik airport

You suggested that improvements to Aleknagik airport be coordinated with the road/bridge projects in view of the improved overland connectivity provided to Dillingham's regional airport. We agree.

It is our understanding that the markets are different. Aleknagik residents want easier access to Dillingham for the obvious benefits in cost of living, freight delivery, and consolidation of government and community services. The driving force for airport improvements at Aleknagik is recreational tourism, namely access to Wood-Tikchik State Park and the Togiak National Wildlife Refuge, where Aleknagik's proximity has clear advantages over Dillingham.

The financial picture

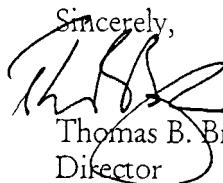
You commented on the concern for adequate maintenance and operations funding. You questioned the State's ability to adequately maintain infrastructure in view of the diminished funding stream available to tap for that purpose and the local communities' limited ability to pick up the slack in view of the region's economic woes.

We believe your concern is valid. But your surrounding discussion seriously misrepresents what the plan actually recommends in the near term, which is very limited and very measured. The plan's actual recommendations are designed to lower transportation costs to residents, allowing more disposable income to be devoted to the region itself. We believe this will encourage economic diversification. The recommendations recognize and encourage potential closure of or transfer of facilities, and private-public partnership in the sharing of responsibility.

Your rationale for tempering our proposal ignores the federal government's commitment to environmental justice, which includes steps to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations. These include transportation benefits enjoyed by most of us living in urban areas that have been denied to Southwest Alaska residents for quite some time. You might want to ask them about that. They are not shy about telling us!

mission remains to responsibly provide and maintain safe and effective transportation facilities as efficiently as we can. We may have to shut down facilities temporarily in the face of severe budget cuts, such as have occurred this legislative session. But we can't plan on that basis. When we plan, we do it with the hope of educating, informing and perhaps inspiring our legislature as well as their constituents; so too our partners in federal, state and local government as well as ourselves. Surely you appreciate as well as we that the current lack of state funding and the shortage of state revenue represents a lack of resolve rather than a lack of available resources.

Thanks again for your valued contributions to the Southwest Alaska Transportation Plan. We truly appreciate your desire to make it a better product for all those affected by its recommendations. We look forward to your continued partnership in this process and others. Should you like to discuss our reply or need additional information, please call me at (907) 465-4070, or call Eric Taylor at (907) 465-8958.

Sincerely,

Thomas B. Brigham
Director

Cc: George Capacci, AMHS